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November 16, 2020

VIA ECF

Hon. George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.
Dated: NOV 16 2020

Re: *P.T. et al. v. N.Y.C. Dep't of Educ., et al.* 20-cv-5074 (GBD)(JLC)

Dear Judge Daniels:

I am Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, supervising attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses in the amount of \$15,965.50 for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* (IDEA), as well as for this action.

I write on behalf of all parties to respectfully request an adjournment of the conference scheduled for November 24, 2020, *sine die*, and to propose that the parties submit a status letter no later than December 18, 2020 informing the Court the case has been fully resolved, or, that the parties wish to proceed to either a settlement conference with Magistrate Judge Cott, or a briefing schedule to be proposed at that time. This is the first request for an adjournment of the initial conference. The need for the extension is provide the parties with additional time to work toward settlement, and the parties are hopeful this case will fully resolve without the need to burden the Court further.

The parties are hopeful that they will fully resolve this action without the need to burden the Court with any further litigation or Court intervention. We note that to date, Defendant and the Dayan Firm have been able to settle every one of the dozens of similar federal actions for fees and costs under the IDEA, and fully expect to be able to settle this case.

Accordingly, the parties respectfully request that the conference scheduled for November 24, 2020, be adjourned *sine die*, and that a status letter be due no later than December 18, 2020.

Respectfully submitted,

/s/

Martin Bowe
Senior Counsel

cc: Adam Dayan, Esq (via ECF)